STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

SBC ILLINOIS	**)**	
	)	
	)	**ICC Docket No. ____**
	)	
Petition for Waiver Pursuant to	**)**	
Part 785 of the Commission's Rules	**)**	

VERIFIED PETITION FOR WAIVER
PURSUANT TO PART 785 OF THE
COMMISSION'S RULE

Illinois Bell Telephone Company ("SBC Illinois") submits this Verified Petition for a Waiver of Part 785.55(a)(3) of the Illinois Administrative Code. In support of this Petition, SBC Illinois states the following:

1. SBC Illinois is seeking a waiver from Administrative Code Part 785.55(a)(3), which states:

> Main power supply systems, both AC and DC, shall be designed to enable a practical, safe disconnection of all interior feed circuits using a master or zoned master switches or fuses. Multiple locations for zoned master switches or fuses may be utilized, but no more than three locations per floor shall be permitted except that existing telecommunications switch facilities with multiple power supply systems exceeding three locations per floor shall develop and utilize a coded layout plan for effective zoned disconnections subject to individual approval by the Office of the State Fire Marshal. Details of such disconnect plan shall be made a part of the pre-emergency plan.

Section 785.65 permits waiver from Part 785.

2. Specifically, SBC Illinois is seeking a waiver for twelve of its central offices from the requirement to limit the number of power supply disconnection points to three locations per floor. These twelve central offices are located in Arlington Heights,

Aurora, Champaign, Chicago (3), Elk Grove, LaGrange, Naperville, Northbrook, Oakbrook and Waukegan.

3. The twelve central offices are all large, and in large central offices, there are reasons for having multiple power disconnection points. In a small central office there is likely to be only one AC power service board, one backup generator and one DC power plant, and thus there is no need to have more than three disconnection points per floor. In large central offices, by contrast, there is more voice and data traffic being processed which results in multiple AC commercial feeds and AC service boards, multiple generators and multiple DC power plants. The reason for the multiple placements of these power units is driven by large loads that cannot be accommodated by a single power unit. Also, multiple power disconnects meet the diversification of loads, which increases the reliability of the SBC Illinois network.

4. In these twelve central offices where there are more than three disconnection points per floor, a central office's power supply can be safely disconnected in the event of an emergency. These disconnects include easy shut offs for the AC service boards and DC power plants at the main breaker or fuse and emergency stop buttons on the backup generators. The equipment that has been installed in the central offices provides adequate space to access the main power disconnection point. A further safety feature employed by SBC Illinois is to "fire-stop" all cable holes between floors, which would provide a two hour barrier to the spread of any fire within the central office.

5. SBC Illinois has employed a color-coded taping process and information binder that would lead fire fighters to the main power disconnect points during any emergency. The color-coded taping system on the walls and floors would guide

emergency personnel to the location of all main power disconnect points in the event of a fire. The color-coded taping system provides markings on the floors and walls, including a reflective tape that would guide a fire fighter to the main power disconnection point. This system would allow the fire fighters to easily shut off power to specific areas of the central office.

6. SBC Illinois also provides an emergency contact and central office layout book at a pre-designated door. This book provides emergency contact information as well as the location and routing information to the main power disconnect. The binder contains information regarding the central office, including a floor plan showing the route to all main power disconnects. The binders are maintained at a predesignated location at the main entrance doors that has been specified by the local fire department.

7. All of these safety items are reviewed with local fire department representatives.

8. SBC Illinois has already redesigned 55 central offices so that there are no more than three disconnection points per floor. However, to redesign and to reduce the power transport switching equipment layout in the remaining twelve central offices to a maximum of three disconnection points would expose SBC Illinois' network traffic and customers to a high risk of service failure. This is due to limited floor space, limited floor loading restrictions, accessibility to existing building super structure and cable rack congestion. All of the above prevent the redesign of the twelve central offices without a serious risk of loss of service to end user customers and CLECs.

9. SBC Illinois has reviewed these safety and designs, as well as the redesign of the 67 offices initially involved, with Staff and the Illinois State Fire Marshall.

10. SBC Illinois will maintain the coded layout plan for effective zone disconnections that it has developed and utilized in these twelve central offices. SBC Illinois will not increase the number of power disconnection points that exist today in these twelve central offices. SBC Illinois has also put engineering procedures in place so that if the power supply systems in these twelve central offices are replaced, there will be no more than three disconnection points per floor.

For all of the above reasons, SBC Illinois respectfully requests that the Commission approve without hearing a waiver of Part 785.55(a)(3) as to twelve of its central offices identified in Paragraph 2 and Proprietary Attachment 1.

Respectfully submitted,

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